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10 Attorneys for Defendants
ZUFFA, LLC and NEULION, INC.

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 CAMERON PARK, JOSHUA RILEY,
14 MICHAEL ADAMI, MEGAN DUNCAN,
BENITO ALICEA, JR., PHILLIP GARCIA,
15 HASAN DAAS, BRAD GRIER, WESLEY
INMAN, MATT LeBOEUF, LLOYD
16 TRUSHEL, MARK WHITE and DONGSHENG
LIU on behalf of themselves and all others
17 similarly situated,

18 Plaintiffs,

19 v.

20 ZUFFA, LLC, a Nevada Limited Liability
21 Company (d/b/a “Ultimate Fighting
22 Championship” and “UFC”); and NEULION,
INC., a Delaware Corporation,

23 Defendants.
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Case No. 2:17-cv-02282-APG-VCF

**STIPULATION TO MODIFY ORDER
DIRECTING NOTICE TO THE CLASS**

1 WHEREAS, this stipulation is entered into by and between plaintiffs Cameron Park, Joshua
2 Riley, Michael Adami, Megan Duncan, Benito Alicea, Jr., Phillip Garcia, Hasan Daas, Brad Grier,
3 Wesley Inman, Matt Leboeuf, Lloyd Trushel, Mark White and Dongsheng Liu (“Plaintiffs”) and
4 defendants Zuffa, LLC d/b/a “UFC” and NeuLion, Inc. (“Defendants”);

5 WHEREAS, this matter pertains to a boxing match held on August 26, 2017 (the “Event”),
6 with Plaintiffs and other Settlement Class Members having paid for the ability to live-stream the
7 Event;

8 WHEREAS, on February 22, 2018, the Court entered an Order granting preliminary
9 approval of the proposed class action settlement agreement (“Settlement Agreement”) and directing
10 notice to the Settlement Class provided in the Settlement Agreement (“Preliminary Approval
11 Order”);

12 WHEREAS, the Preliminary Approval Order directed that notice be disseminated on or
13 before April 9, 2018;

14 WHEREAS, the Settlement Agreement provided that the Settlement Administrator would
15 disseminate notice by, among other things, sending the Direct Email Notice (attached to the
16 Settlement Agreement as Exhibit D) to the Settlement Class Members;

17 WHEREAS, Defendants possess email contact information for most Settlement Class
18 Members but, in cases where a Settlement Class Member purchased streaming access to the Event
19 from a partner (Amazon, Apple or Microsoft), only the partner possesses such information;

20 WHEREAS, Amazon, upon having received a subpoena from Defendants for the relevant
21 contact information, contacted Defendants’ counsel and expressed a preference to notify its affected
22 customers itself, rather than having the notice come from the Settlement Administrator;

23 WHEREAS, in compromise, Amazon has agreed to send the following email on or before
24 April 9, 2018 (hereafter, “Amazon Direct Email Notice”) to Settlement Class Members who
25 purchased streaming access to the Event from Amazon, with the subject heading “Court Ordered
26 Class Action Notice: online stream of the Floyd Mayweather v. Conor McGregor boxing match”:

27 Amazon is sending you this email because our records indicate that you purchased the online
28 stream of the August 26, 2017 Floyd Mayweather vs. Conor McGregor boxing match. If so,
you might be entitled to payment from a settlement.

1 In March 2018, a federal court in Nevada approved the settlement of a class action lawsuit
2 regarding disruptions to the online stream of the Mayweather-McGregor fight. If you were
3 not able to view some or all of the event due to streaming disruption, you may be eligible to
4 receive between \$25 and \$99.99 depending on how much of the event you could not
watch. You must submit a valid claim to receive a payment. Claims must be submitted by
August 20, 2018.

5 Amazon is sending this email on behalf of the defendants in the lawsuit, and as required by
6 the court. Because we are not involved in the lawsuit, however, we cannot assist you
7 directly. To view the full email notice approved by the Court, click here [hyperlink to be
8 inserted]. To get a copy of the full Settlement Notice or a Claim Form by U.S. Mail or email,
you can call the following toll free telephone number: [Settlement Administrator telephone
number to be inserted]. To get more information or to file a claim electronically, please go to
www.UFCPPVSettlement.com.

9 WHEREAS, the Settlement Administrator has received email contact information for
10 Settlement Class Members who purchased access from Defendants and Apple, and is prepared to
11 send the Direct Email Notice to them by April 9, 2018, such that, together with Amazon sending
12 the Amazon Direct Email Notice by April 9, 2018, email notice to the settlement class will be
13 substantially complete on the date contemplated by the Preliminary Approval Order;

14 WHEREAS, Microsoft will be providing the Settlement Administrator with the email
15 contact information of its purchasers on April 4, 2018, and it is anticipated that the Settlement
16 Administrator will need an additional two days, until on or before April 11, 2018, to send the
17 Direct Email Notice to Microsoft purchasers;

18 WHEREAS, Plaintiffs and Defendants request that the Court modify the notice plan based
19 on the above;

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
21 Plaintiffs and Defendants, subject to the approval of the Court, that the Preliminary Approval
22 Order be modified as follows:

- 23 1. Defendants shall be responsible for causing Amazon to send the Amazon Direct
24 Email Notice to those Settlement Class Members who purchased streaming access to
25 the Event from Amazon;
- 26 2. Defendants shall be responsible for causing Amazon to disseminate the Amazon
27 Direct Email Notice on or before April 9, 2018;
- 28 3. The deadline for the Direct Email Notice to be sent to Microsoft purchasers is

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extended to on or before April 11, 2018; and

4. Defendants shall be responsible for furnishing to the Court, fourteen (14) days prior to the Fairness Hearing, a declaration from Amazon attesting to the number of notices sent and the date(s) on which the notices were sent.

IT IS SO STIPULATED.

DATED: April 3, 2018

LIPSON NEILSON, P.C.

/s/ David A. Markman

David A. Markman

Attorneys for Plaintiffs

DATED: April 3, 2018

CAMPBELL & WILLIAMS


/s/ Philip R. Erwin

J. Colby Williams

Philip R. Erwin

*Attorneys for Defendants Zuffa, LLC and
NeuLion, Inc.*

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: April 4, 2018.